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	Counsel for Defendant Google LLC	
16	LIMITED STATES	DISTRICT COURT
17		
18	NORTHERN DISTRICT OF CAI	LIFORNIA, OAKLAND DIVISION
19	CHASOM BROWN, WILLIAM BYATT,	Case No. 4:20-cv-03664-YGR-SVK
20	JEREMY DAVIS, CHRISTOPHER CASTILLO, and MONIQUE TRUJILLO,	DECLARATION OF JONATHAN TSE IN
21	individually and on behalf of all similarly	SUPPORT OF PLAINTIFFS' ADMINISTRATIVE MOTION TO SEAL
22	situated,	PLAINTIFFS' RENEWED REQUEST TO
23	Plaintiffs,	DEPOSE GOOGLE CEO SUNDAR PICHAI
24	v.	
25	GOOGLE LLC,	Judge: Hon. Susan van Keulen, USMJ
26	Defendant.	
27		
28		

Case No. 4:20-cv-03664-YGR-SVK

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I, Jonathan Tse, declare as follows:

- I am a member of the bar of the State of California and an attorney at Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC ("Google") in this action. I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.
- 2. I am making this declaration pursuant to Civil Local Rule 79-5(e)-(f) as an attorney for Google as the Designating Party, pursuant to Civil Local Rule 79-5(f)(3) in response to Dkts. 634, 635.
- 3. On July 21, 2022, Plaintiffs filed an Administrative Motion to file under seal portions of their Motion to Depose Google CEO Sundar Pichai ("Plaintiffs' Motion"). On July 27, 2022, the Court granted the Parties' Joint Stipulation and Proposed Order extending time for Google to submit its declaration in support of Plaintiffs' Motion to Seal to August 11, 2022 (Dkt. 640).
- 4. I have reviewed the documents that Plaintiffs seek to file under seal pursuant to Civil Local Rule 79-5, unredacted versions of which have been filed at Docket Entry 634. Based on my review, there is good cause to seal the following information:

Document	
Plaintiffs' Renewed Request to	-
Depose Google CEO Sundar Pichai	1
at:	1
	۱,

Pages: 2:22-27, 3:1, 3:3, 3:7-9

Basis for Sealing The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including Google's internal projects and identifiers, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

1	Exhibit A to Baeza Declaration	The information requested to be sealed contains Google's
2	(GOOG-CABR-05468324) at:	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
3	Seal Entirely	operations, including various types of Google's internal
4		projects, identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary
5		course of its business and is not generally known to the public or Google's competitors. Such confidential and
6		proprietary information reveals Google's internal strategies, system designs, and business practices for
7		operating and maintaining many of its important services,
8		and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public
9		disclosure of such confidential and proprietary information could affect Google's competitive standing
10		as competitors may alter their systems and practices
11		relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third
12		parties may seek to use the information to compromise Google's internal practices relating to competing
		products.
13	Exhibit E to Baeza Declaration (Deposition of Chris Palmer) at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
14	_	highly sensitive features of Google's internal systems and
15	Pages: 113:13-14, 187:17, 188:2, 188:7, 188:17, 188:23, 189:2, 189:6,	operations, including Google's internal projects, identifiers, and their proprietary functionalities, that
16	189:9, 189:14, 189:18-21	Google maintains as confidential in the ordinary course of
17		its business and is not generally known to the public or Google's competitors. Such confidential and proprietary
18		information reveals Google's internal strategies, system designs, and business practices for operating and
19		maintaining many of its important services, and falls within the protected scope of the Protective Order entered
20		in this action. See Dkt. 81 at 2-3. Public disclosure of such
21		confidential and proprietary information could affect Google's competitive standing as competitors may alter
22		their systems and practices relating to competing products. It may also place Google at an increased risk of
23		cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices
24		relating to competing products.
25	Exhibit G to Baeza Declaration (GOOG-BRWN-00391231) at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
26	Pages: -231, -232	highly sensitive features of Google's internal systems and
27		operations, including Google's internal projects and identifiers, that Google maintains as confidential in the
28		ordinary course of its business and is not generally known
20		to the public or Google's competitors. Such confidential

1		and proprietary information reveals Google's internal
$_{2}\Vert$		strategies, system designs, and business practices for
		operating and maintaining many of its important services, and falls within the protected scope of the Protective
3		Order entered in this action. See Dkt. 81 at 2-3. Public
4		disclosure of such confidential and proprietary
5		information could affect Google's competitive standing
		as competitors may alter their systems and practices relating to competing products. It may also place Google
6		at an increased risk of cybersecurity threats, as third
7		parties may seek to use the information to compromise
8		Google's internal practices relating to competing products.
	Exhibit H to Baeza Declaration	The information requested to be sealed contains Google's
9	(GOOG-CABR-04971903) at:	highly confidential and proprietary information regarding
10	Page: -903	highly sensitive features of Google's internal systems and operations, including Google's internal projects and
11		identifiers, that Google maintains as confidential in the
		ordinary course of its business and is not generally known
12		to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal
13		strategies, system designs, and business practices for
14		operating and maintaining many of its important services,
15		and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public
		disclosure of such confidential and proprietary
16		information could affect Google's competitive standing as competitors may alter their systems and practices
17		relating to competing products. It may also place Google
18		at an increased risk of cybersecurity threats, as third
		parties may seek to use the information to compromise Google's internal practices relating to competing
19		products.
20	Exhibit L to Baeza Declaration	The information requested to be sealed contains Google's
21	(GOOG-CABR-04991831) at:	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
22	Page: -831	operations, including Google's internal projects and
		identifiers, that Google maintains as confidential in the
23		ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential
24		and proprietary information reveals Google's internal
25		strategies, system designs, and business practices for operating and maintaining many of its important services,
26		and falls within the protected scope of the Protective
		Order entered in this action. See Dkt. 81 at 2-3. Public
27		disclosure of such confidential and proprietary information could affect Google's competitive standing
28		as competitors may alter their systems and practices

1		relating to competing products. It may also place Google
2		at an increased risk of cybersecurity threats, as third
		parties may seek to use the information to compromise Google's internal practices relating to competing
3		products.
4	Exhibit M to Baeza Declaration	The information requested to be sealed contains Google's
5	(GOOG-BRWN-00140297) at:	highly confidential and proprietary information regarding
3	Pages: -311-313, -315-319, -323, -	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
6	325, -327-329	projects, identifiers, and their proprietary functionalities,
7		that Google maintains as confidential in the ordinary
		course of its business and is not generally known to the
8		public or Google's competitors. Such confidential and proprietary information reveals Google's internal
9		strategies, system designs, and business practices for
10		operating and maintaining many of its important services,
		and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public
11		disclosure of such confidential and proprietary
12		information could affect Google's competitive standing
13		as competitors may alter their systems and practices relating to competing products. It may also place Google
		at an increased risk of cybersecurity threats, as third
14		parties may seek to use the information to compromise
15		Google's internal practices relating to competing
16	Exhibit N to Baeza Declaration	products. The information requested to be sealed contains Google's
	(GOOG-CABR-05126022) at:	highly confidential and proprietary information regarding
17	Page -023	highly sensitive features of Google's internal systems and
18		operations, including Google's internal projects and identifiers, that Google maintains as confidential in the
19		ordinary course of its business and is not generally known
		to the public or Google's competitors. Such confidential
20		and proprietary information reveals Google's internal strategies, system designs, and business practices for
21		operating and maintaining many of its important services,
22		and falls within the protected scope of the Protective
		Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary
23		information could affect Google's competitive standing
24		as competitors may alter their systems and practices
25		relating to competing products. It may also place Google
		at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise
26		Google's internal practices relating to competing
27	E-13-4 O to B	products.
28	Exhibit O to Baeza Declaration (GOOG-CABR-04675770) at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding

1		highly sensitive features of Google's internal systems and
$_{2}\Vert$	Pages: -770-771	operations, including Google's internal projects and
		identifiers, that Google maintains as confidential in the ordinary course of its business and is not generally known
3		to the public or Google's competitors. Such confidential
4		and proprietary information reveals Google's internal
ہے		strategies, system designs, and business practices for
5		operating and maintaining many of its important services, and falls within the protected scope of the Protective
6		Order entered in this action. See Dkt. 81 at 2-3. Public
7		disclosure of such confidential and proprietary
		information could affect Google's competitive standing
8		as competitors may alter their systems and practices relating to competing products. It may also place Google
9		at an increased risk of cybersecurity threats, as third
		parties may seek to use the information to compromise
10		Google's internal practices relating to competing
11	Exhibit P to Baeza Declaration	products. The information requested to be sealed contains Google's
12	(Deposition of Rory McClelland) at:	highly confidential and proprietary information regarding
	Pages: 118:2, 118:7, 118:12, 118:15-	highly sensitive features of Google's internal systems and
13	16, 118:23, 120:4-5, 120:11	operations, including Google's internal projects and
14		identifiers, that Google maintains as confidential in the ordinary course of its business and is not generally known
15		to the public or Google's competitors. Such confidential
		and proprietary information reveals Google's internal
16		strategies, system designs, and business practices for
17		operating and maintaining many of its important services, and falls within the protected scope of the Protective
10		Order entered in this action. See Dkt. 81 at 2-3. Public
18		disclosure of such confidential and proprietary
19		information could affect Google's competitive standing as competitors may alter their systems and practices
20		relating to competing products. It may also place Google
		at an increased risk of cybersecurity threats, as third
21		parties may seek to use the information to compromise
22		Google's internal practices relating to competing products.
23	Exhibit Q to Baeza Declaration	The information requested to be sealed contains Google's
24	(Deposition of Abdelkarim Mardini) at:	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
		operations, including various types of Google's internal
25	Pages: 317:7, 317:14-15, 317:22-23, 318:1-2, 318:4, 318:15-319:8,	projects, identifiers, and their proprietary functionalities,
26	319:14, 371:7-10, 371:13-15,	that Google maintains as confidential in the ordinary
27	371:22-23, 372:1-2, 373:14,18, 373:22-24	course of its business and is not generally known to the public or Google's competitors. Such confidential and
27		proprietary information reveals Google's internal
28		strategies, system designs, and business practices for

1		operating and maintaining many of its important services,
2		and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public
3		disclosure of such confidential and proprietary information could affect Google's competitive standing
4		as competitors may alter their systems and practices
5		relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third
6		parties may seek to use the information to compromise
7		Google's internal practices relating to competing products.
	Exhibit R to Baeza Declaration (Deposition of Chetna Bindra) at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
8		highly sensitive features of Google's internal systems and
9	Pages: 218:11-13	operations, including Google's internal projects and identifiers, that Google maintains as confidential in the
10		ordinary course of its business and is not generally known
11		to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal
12		strategies, system designs, and business practices for operating and maintaining many of its important services,
13		and falls within the protected scope of the Protective
14		Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary
15		information could affect Google's competitive standing as competitors may alter their systems and practices
16		relating to competing products. It may also place Google
17		at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise
18		Google's internal practices relating to competing products.
19	Exhibit S to Baeza Declaration (GOOG-BRWN-00388293) at:	The information requested to be sealed contains Google's
20		highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
21	Page: -295	operations, including Google's internal communication channels, that Google maintains as confidential in the
22		ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential
23		and proprietary information reveals Google's internal
24		strategies, system designs, and business practices for operating and maintaining many of its important services,
25		and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public
26		disclosure of such confidential and proprietary
27		information could affect Google's competitive standing as competitors may alter their systems and practices
28		relating to competing products. It may also place Google
28	L	at an increased risk of cybersecurity threats, as third

1		parties may seek to use the information to compromise
2		Google's internal practices relating to competing products.
3	Exhibit T to Baeza Declaration (Deposition of Lorraine Twohill) at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
4	Page: 120:6-12	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
5		projects, and their proprietary functionalities, that Google
6		maintains as confidential in the ordinary course of its business and is not generally known to the public or
7		Google's competitors. Such confidential and proprietary
8		information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls
9		within the protected scope of the Protective Order entered
10		in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
11		Google's competitive standing as competitors may alter
12		their systems and practices relating to competing products. It may also place Google at an increased risk of
13		cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices
14		relating to competing products.
15	Exhibit V to Baeza Declaration (GOOG-CABR-00501220) at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
16	Pages: -221-222, -224-225	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
17		projects, identifiers, and their proprietary functionalities,
18		that Google maintains as confidential in the ordinary course of its business and is not generally known to the
19		public or Google's competitors. Such confidential and proprietary information reveals Google's internal
20		strategies, system designs, and business practices for operating and maintaining many of its important services,
21		and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public
22		disclosure of such confidential and proprietary
23		information could affect Google's competitive standing as competitors may alter their systems and practices
24		relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third
25		parties may seek to use the information to compromise
		Google's internal practices relating to competing products.
26 27	Exhibit Y to Baeza Declaration (GOOG-CABR-05756489) at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
28	Pages: -491, -494, -499-501, -504-505, -507-512	highly sensitive features of Google's internal systems and operations, including various types of Google's internal

1 2 3 4 5 6 7 8 9		projects, identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing
10		products.
11	Exhibit Z to Baeza Declaration (GOOG-BRWN-00406065) at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
12	Pages: -065-069	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
13		projects, identifiers, and their proprietary functionalities,
14		that Google maintains as confidential in the ordinary course of its business and is not generally known to the
15		public or Google's competitors. Such confidential and proprietary information reveals Google's internal
16		strategies, system designs, and business practices for operating and maintaining many of its important services,
17		and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public
18		disclosure of such confidential and proprietary information could affect Google's competitive standing
19		as competitors may alter their systems and practices
20		relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third
21 22		parties may seek to use the information to compromise Google's internal practices relating to competing
23	Proposed Order at:	products. The information requested to be sealed contains Google's
24	Page: 6:2, 6:4-5, 6:7-8, 6:11, 6:16,	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
25	6:18, 6:28	operations, including Google's internal projects and
26		identifiers, that Google maintains as confidential in the ordinary course of its business and is not generally known
27		to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal
28		strategies, system designs, and business practices for
20	<u> </u>	operating and maintaining many of its important services,

1	and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public
2	disclosure of such confidential and proprietary information could affect Google's competitive standing
3	as competitors may alter their systems and practices
4 5	relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third
6	parties may seek to use the information to compromise Google's internal practices relating to competing products.
7	
8	Google's request is narrowly tailored in order to protect its confidential information. These
9	redactions are limited in scope and volume. Because the proposed redactions are narrowly tailored
10	and limited to portions containing Google's highly-confidential or confidential information, Google
11	requests that the portions of the aforementioned documents be redacted from any public version of
12	those documents.
13	
14	I declare under penalty of perjury of the laws of the United States that the foregoing is true
15	and correct. Executed in San Francisco, California on August 11, 2022.
16	
17	DATED: August 11, 2022 QUINN EMANUEL URQUHART & SULLIVAN, LLP
18	
19	By /s/ Jonathan Tse
20	By /s/ Jonathan Tse Jonathan Tse
21	Attorney for Defendant
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